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October 16, 2020

VIA ECF

Honorable Roanne L. Mann
Chief Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Clint Tess v. City of New York, et al.
No. 18-cv-06542 (KAM) (RLM)

Your Honor:

I am the attorney assigned to represent defendants the City of New York, and individually named defendants Jackson, Eltabib, Sanchez, Armstrong, Doonerhornick, Taylor, Walker, Tobin, Iecampo, Feder, Dorisme, Shtotland, Hussameldon, Niemeyer, and Alexander in the above-referenced matter. Defendants write, jointly with Plaintiff, to respectfully request an extension of time in which to complete depositions, from the current deadline of October 16, 2020 to October 23, 2020. This is the eighth and final request for an extension of this deadline. As the Court may recall, the prior extension of two weeks was requested because defendant Lieutenant Hussameldon was been out sick and was scheduled to return to work within that time period. The lieutenant's first day back at work was yesterday, October 15, 2020, and the parties have agreed to conduct his deposition next Thursday, October 22, 2020. Accordingly, the parties respectfully request that the Court extend the time to complete all depositions to October 23, 2020, and also grant a corresponding extension of the deadline to file a Pre-Motion Conference Request to October 30, 2020.

Thank you for your time and attention to this matter.

Sincerely,

Angharad Wilson
Senior Counsel

cc: **BY ECF**
Robert Marinelli, Esq.
Attorney for Plaintiff
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